

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

NOTICE OF MOTION

UNITED STATES OF AMERICA,

v.

19-CR-227 (JLS) (MJR)

JOSEPH BONGIOVANNI,
PETER GERACE, JR.,

Defendants.

UNITED STATES OF AMERICA,

v.

23-CR-37 (JLS) (MJR)

PETER GERACE, JR.,

Defendant.

MOTION MADE BY:

Defendant, Peter Gerace, Jr., by and
through his attorneys, Lippes Mathias
LLP.

DATE, TIME AND PLACE:

At a date and time determined by the
Court, Robert H. Jackson Courthouse,
2 Niagara Square, Buffalo NY 14202.

SUPPORTING PAPERS:

Declaration of Eric M. Soehnlein, Esq.,
dated May 22, 2023.

RELIEF REQUESTED:

An Order of this Court:

1. Re-opening the Detention Hearing
because of new information not
previously known to defense counsel;
2. Releasing Mr. Gerace in accord to the
terms and conditions suggested
herein; and

3. For such other and further relief as the Court deems just and proper.

DATED: Buffalo, New York
May 24, 2023

Respectfully submitted,

LIPPES MATHIAS LLP

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